



Portland General Electric Company
121 SW Salmon Street • Portland, Oregon 97204

October 22, 2013

ES-305-2013

ENV-7

Dr. David Edwards
Manager of ARB Climate Change Reporting Section
Air Quality Planning and Science Division
California Air Resources Board
1001 "I" Street
Sacramento, CA 95814

RE: Comments of Portland General Electric Company on Proposed Amendments to the Regulation for Mandatory Reporting of Greenhouse Gas Emissions

Dear Mr. Edwards:

Portland General Electric Company (PGE) appreciates the opportunity to provide comments to California Air Resources Board (ARB) on the Proposed Amendments to the Mandatory Reporting Regulation. Our comments below are directed at requirements specific to electric power entities.

System Power Supplier Emission Factors

Per §95111(b)(5), ARB will calculate and publish, on the Mandatory Reporting website prior to each calendar year, the system emission factor for all system power suppliers identified by ARB, for use in determining emissions associated with system power. This section also states that publicly available information, information voluntarily made available, or other information accessible by ARB may be used. It is unclear, however, what specific information or sources of information will be used to calculate these system emission factors and whether system power suppliers will be able to review and comment on their specific factor. Also, it is not clear whether the high emission factor will be assigned only to direct imports by the system owner and imports procured pursuant to a specified power contract with the system owner (or whether ARB would assign the emission factor to any tags originating such systems). PGE requests clarification in the regulation on these items.

PGE appreciates the opportunity to provide comments to ARB with regard to the Proposed Amendments to the Mandatory Reporting Regulation. For any follow-up communications, please contact me at (503) 464-8528 or via e-mail at Elysia.Treanor@pgn.com.

Respectfully,

Elysia Treanor
Environmental Specialist

cc: Cathy Kim
Crystal Lindquist